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VIA ECF

Honorable Vernon S. Broderick
United States District Judge
Southern District of New York

Re: Colon v. N.Y.C. Hous. Auth. et al.,
16 Civ. 4540 (VSB) (OTW)

Williams v. N.Y.C. Hous. Auth. et al.,
16 Civ. 8193 (VSB) (OTW)

Dear Judge Broderick:

I am an Assistant Corporation Counsel in the office of Georgia M. Pestana, Acting Corporation Counsel of the City of New York ("Corporation Counsel"), counsel for Defendant Melissa Mark-Viverito in the above-referenced actions, which were consolidated for pre-trial purposes. I write on behalf of all parties to propose a briefing schedule for all Defendants' anticipated motions for summary judgment in both the *Colon* and *Williams* matters.

Discovery has closed in both actions. The parties conducted a final deposition on September 23, 2019 and anticipate receiving the transcript from that deposition by mid-October. For the Court's convenience, and to avoid unnecessary duplication, Defendants propose briefing summary judgment in the *Colon* and *Williams* actions contemporaneously. Additionally, I have advised all parties that I am leaving Corporation Counsel effective next week. The next Corporation Counsel attorney will require substantial time to review the extensive discovery record in these actions and prepare the summary judgment motions. Accordingly, and in light of the above, the parties jointly propose the following briefing schedule for all Defendants' summary judgment motions in both the *Colon* and *Williams* actions:

- Defendants to file summary judgment motions by January 17, 2020;
- Plaintiffs to file opposition by March 20, 2020;
- Defendants to file reply papers by April 17, 2020.

I thank the Court for its attention to this matter.

Respectfully,
/s/ John Corbin Carter
Assistant Corporation Counsel

cc: All Counsel of Record
(via ECF)